

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

IN RE:)	CASE NO: 21- 51382 - amk
)	
Rebecca Cagulada Portman)	CHAPTER 7
)	JUDGE ALAN M. KOCHIK
Debtor.)	

DEBTOR'S RESPONSE TO THE MOTION FOR RELIEF FROM STAY
FILED BY URS AND KAREN SCHNEEBERGER

1. Debtor moves this Honorable Court for its order denying the Motion for Relief from Stay, filed by Urs and Karen Schneeberger.

2. In support of this Response debtor states that movants base their State complaint on multiple allegations, one of which is fraud pursuant to Ohio law. Bankruptcy section 523 specifically exempts from general non-dischargability several classes of cases, one of which are cases alleging fraud. To have such cases determined to be non-dischargeable, an Adversary Complaint must be filed in the Bankruptcy Court and the issues litigated pursuant to the restrictions and criteria set for in section 523.

WHEREFORE debtor moves this Honorable Court for an order denying the Motion for Relief from Stay, filed by Urs and Karen Schneeberger

Respectfully submitted,

/s/ Mark H. Knevel

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CERTIFICATE OF SERVICE

Debtor, by and through counsel, hereby certifies a copy of the foregoing Debtor's Response to the Motion for Relief from Stay, filed by Urs and Karen Schneeberger., was served upon the following, by CM / ECF Noticing System or ordinary US Mail, as indicated, on this the 30th day of November, 2021:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

United States Trustee for Region 9

Cleveland Office of the United States Trustee, on behalf of Andrew Vara,
United States Trustee for Region 9.

Chapter 7 Trustee
Julie Zurn

By Ordinary US Mail

Debtor
Rebecca Cagulada Portman
1422 Wuchter Street
Barberton, OH 44203

/s/ Mark H. Knevel

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